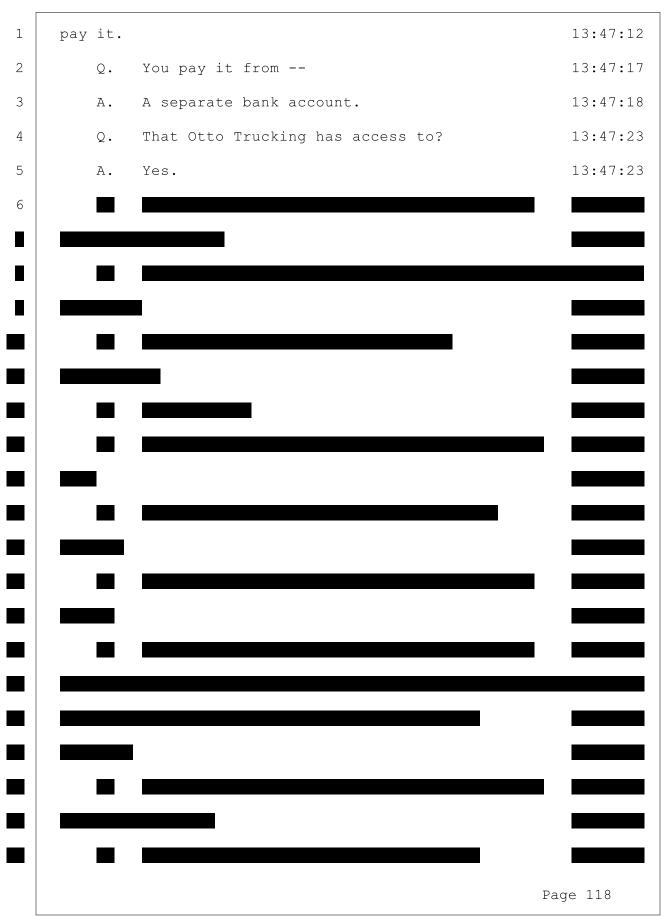
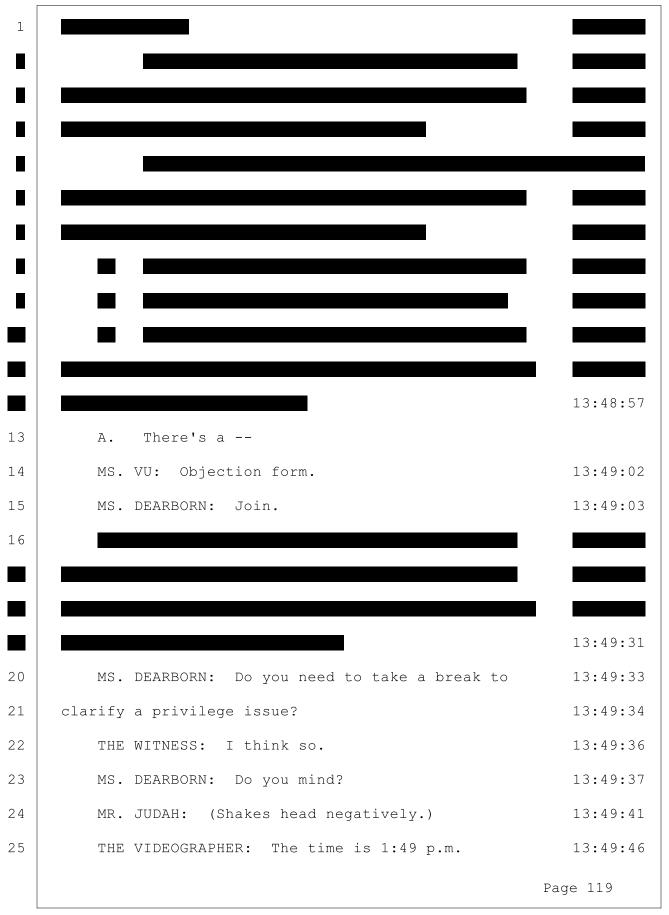
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1
                  UNITED STATES DISTRICT COURT
 2
                 NORTHERN DISTRICT OF CALIFORNIA
 3
                     SAN FRANCISCO DIVISION
 4
 5
     WAYMO LLC,
                    Plaintiff,
 6
 7
                                        Case No.
     VS.
     UBER TECHNOLOGIES, INC.; 3:17-cv-00939-WHA
 8
 9
     OTTOMOTTO LLC; OTTO TRUCKING LLC,
                    Defendants.
10
11
12
13
14
15
             VIDEOTAPED DEPOSITION OF BRENT SCHWARZ
16
                    TUESDAY, AUGUST 15, 2017
17
18
19
20
     Reported by:
21
     Anrae Wimberley
22
    CSR No. 7778
23
    Job No. 2680988
24
    PAGES 1 - 296
25
                                                  Page 1
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1	Q.	What is his title?	13:45:39
2	Α.	I think he's a senior engineering director.	13:45:42
3	Q.	Do you have any direct reports right now?	13:45:45
4	Α.	I have two full-time employees. Actually,	I 13:45:49
5	think it	's going to be four in a couple days.	13:45:52
6		And then I have four or five contractors.	13:45:59
7	Q.	Who did you report to when you first became	13:46:03
8	an Uber (employee?	13:46:05
9	А.	Lior Ron.	13:46:06
10	Q.	And did you have any direct reports at that	13:46:08
11	time?		13:46:09
12	Α.	No.	13:46:09
13	Q.	So now focusing on the second of the three	13:46:14
14	areas yo	u identified, a difference between your job	13:46:17
15	now vers	us your job when you were at Ottomotto.	13:46:20
16		So that would be Otto Trucking; correct?	13:46:37
17	А.	Otto Trucking was the second entity I	13:46:40
18	mentione	d, yes.	13:46:41
19	Q.	Yes. So can you elaborate on your on you	ur 13:46:43
20	work for	Otto Trucking?	13:46:47
21	Α.	My role is to make sure that every resource	13:46:52
22	that Otto	o Trucking consumes it pays for.	13:46:58
23	Q.	And how does Otto Trucking pay for resource:	s 13:47:03
24	it consur	mes?	13:47:05
25	Α.	I Uber, UTI, will send me an invoice and	I 13:47:10
			Page 117

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1	We're off the record.	13:49:48
2	(Recess taken.)	13:58:52
3	THE VIDEOGRAPHER: The time is 1:59 p.m.	13:59:09
4	We're back on the record.	13:59:11
5	BY MR. JUDAH:	13:59:11
6	Q. So I had a question pending before the break.	13:59:14
7	And did you have a chance to get	13:59:17
8	clarification so you can answer it?	13:59:20
9	A. Yes.	13:59:20
10	Q. All right. So what's the answer?	13:59:21
11		
		13:59:45
21	Q. Who do you work with from Uber Finance and	13:59:49
22	Treasury?	13:59:51
23	A. On treasury, it's .	13:59:53
24	On finance, it's series of people:	
		14:00:08
	Pac	ge 120
		-

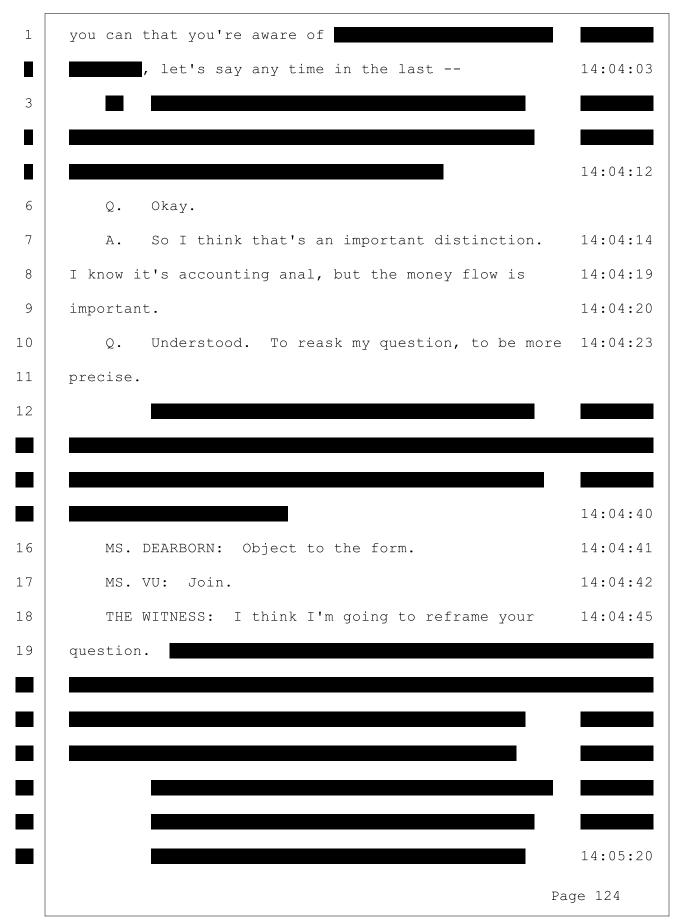
Case 3:17-cv-00939-WHA Document 1528-29 Filed 09/12/17 Page 6 of 14

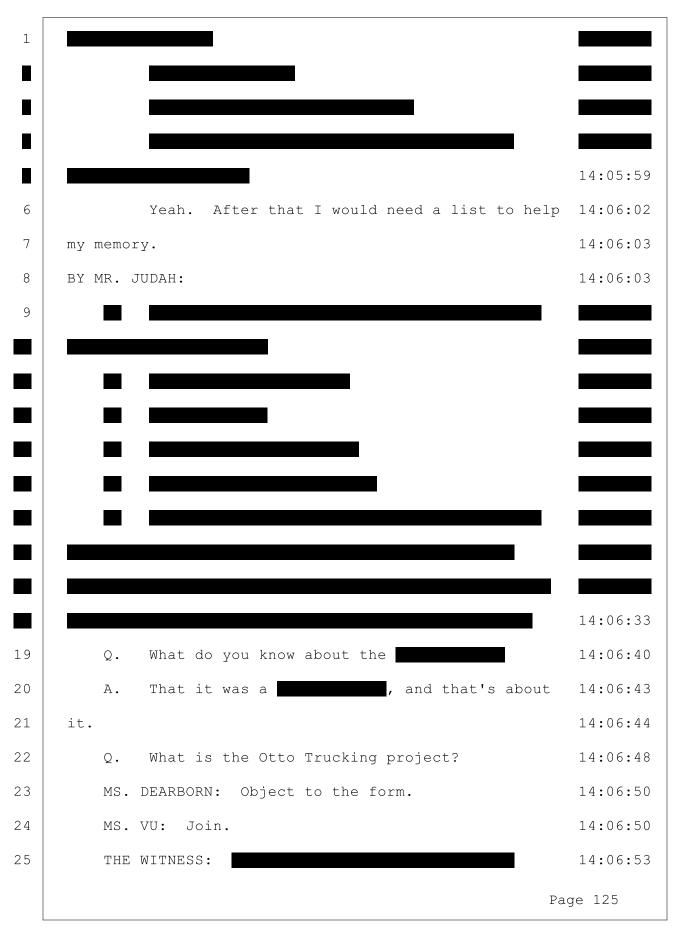
1		They're the primary contacts.	14:00:10
2	Q.	You referred earlier to a run rate and a burn	14:00:16
3	rate.		14:00:16
4		Do you remember that?	14:00:18
5	Α.	I said those two things, yes.	14:00:20
6	Q.	Yes. What do those refer to?	14:00:21
7	Α.	How much the business is spending. So	14:00:24
8	Trucking	doesn't have any revenue, per se. So I have	14:00:28
9	to monit	or employees, trucks, stuff like that.	14:00:34
10	Q.	Is that the run rate or the burn rate?	14:00:39
11	А.	I use those interchangeably.	14:00:41
12	Q.	What is Otto Trucking's burn rate?	14:00:48
13	А.	I don't know off the top of my head. If I	14:00:54
14	were to	hazard a guess, I would say it's about	14:00:56
15		over the last year.	14:01:00
16	Q.	And that's approximately how long you've been	14:01:04
17	in this	role and have been monitoring the burn rate	14:01:09
18	for Otto	Trucking; is that right?	14:01:11
19	Α.	Yeah.	14:01:11
20	Q.	What has Otto Trucking been spending this	14:01:15
21	money on	?	14:01:16
22	А.		
			14:01:34
		Pa	age 121

1		
1		
		14:01:53
5	A. Can you be a little bit more precise on that?	14:01:58
6	MS. VU: Objection, form.	14:02:01
7	BY MR. JUDAH:	14:02:01
8	Q. So you testified that	
		14:02:04
10	Do you remember that?	14:02:05
11	A. Yes.	14:02:05
12		
		1.4.00.00
		14:02:36
22	BY MR. JUDAH:	14:02:36
23	Q. So Otto Trucking has a monthly P&L?	14:02:39
24	A. Yes.	14:02:39
25	Q. Who prepares that?	14:02:41
	Pa	ge 122

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1	A. I do, with help from Kong Basile.	14:02:47
2	Q. Who is Kong Basile?	14:02:48
3	A. They're the accounting firm I mentioned	14:02:50
4	before.	14:02:51
5		
		14:03:07
10	A. It varies, depending on where they are in the	14:03:10
11	project.	
		14:03:20
15	But it fluctuates month to month.	14:03:24
16		
		14:03:36
19	MS. DEARBORN: Object to the form.	14:03:38
20	MS. VU: Join.	14:03:43
21	THE WITNESS: I could name off a bunch of names.	14:03:47
22	I wouldn't be able to come up with a complete list.	14:03:51
23	Do you want me to just start naming names?	14:03:54
24	BY MR. JUDAH:	14:03:54
25	Q. Yeah. If you could just identify as many as	14:03:57
	Pa	age 123





1		14:06:59
2	BY MR. JUDAH:	14:06:59
3	Q. If you wanted to get a complete list of	14:07:07
4	employees that were let me ask that again.	14:07:12
5		
		14:07:24
9	MS. DEARBORN: Object to the form.	14:07:25
10	MS. VU: Join.	14:07:26
11	THE WITNESS: Workday.	14:07:28
12	BY MR. JUDAH:	14:07:28
13	Q. I'm sorry?	14:07:29
14	A. Workday.	14:07:29
15	Q. What's that?	14:07:30
16	A. It's an internal tool that employees use to	14:07:34
17	know what org chart and cost center they're associated	14:07:38
18	to.	14:07:38
19	Q. Is that something you would, like, log on to?	14:07:44
20	A. Um-hum.	14:07:45
21	Q. So if you went back to your office, logged on	14:07:48
22	to Workday, what exactly would you do next in order to	14:07:52
23	call up the information of	
		14:08:05
	Pa	ge 126

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1	MS. VU: Object to the form.	14:08:06
2	MS. DEARBORN: Join.	14:08:07
3	THE WITNESS: I would go to Workday, I would drill	14:08:12
4	down into UATG,	
		14:08:20
6	The names in there change. I haven't looked	14:08:22
7	at it recently. My name could be in there. I like	14:08:26
8	I said, I haven't looked recently.	14:08:28
9	BY MR. JUDAH:	14:08:28
10	Q. Who makes the decision as to who is assigned	14:08:31
11	to the Otto Trucking project?	14:08:34
12	A. I believe it was	
		14:08:42
14	I'm supposed to work with him in the next	14:08:45
15	couple of weeks I have to get through this week	14:08:48
16	to revisit that and make sure that he's doing it	14:08:52
17	correctly.	14:08:53
18		
		14:09:08
21	MS. DEARBORN: Object to the form.	14:09:09
22	MS. VU: Object to the form.	14:09:11
23	MS. DEARBORN: Join.	14:09:12
24		14:09:13
25	BY MR. JUDAH:	14:09:13
	Pa	ge 127

